AMENDMENTS TO THE DRAWINGS

The attached sheets of drawings includes changes to FIGS. 59-61.

Attachment: 3 Replacement sheets

REMARKS

This reply is submitted in response to the Final Office Action dated April 7, 2006. The amendments above and the remarks that follow address the points raised in the Office Action and, thereby to place this application in condition for allowance.

Priority

The Examiner contends that the application is not entitled to the benefit of the provisional patent applications. Applicant supplied with its response of April 28, 2004 reasons why this application is entitled to the priority date of the provisional, and incorporates those reasons by reference. Since the Examiner has not applied prior art that was available for the rejection dated between the claimed priority date and the effective date of this application, Applicants consider this issue closed until such time as it becomes relevant.

Double Patenting

Claims 1-11, 24-28, 32-38, and 40 stand provisionally rejected for obviousness-type double patenting over the claims in U.S. Patent Application 09/823,938. Applicants do not agree with the double patenting rejection, as discussed in a previous Office Action response. Applicants request that this issue be held in abeyance until allowable subject matter is indicated.

Information Disclosure Statement

The Examiner requests copies of a number of references listed on an IDS filed on November 14, 2005 that were missing dates. Applicants submit copies of those references with this response. With respect to reference entitled "Reference: Rulemaking 8775-ACTA Petition on Internet Telephony – ACTA Petition on Internet Telephony before the Federal Communications Commission" dated October 11, 2005, the Examiner has requested that a prior version of this reference be submitted. This is the earliest date this references was available and, as such, an earlier version is not available.

Specification

The Examiner has objected to the specification for informalities regarding FIGS. 59-61 that were submitted in the Office Action dated October 20, 2005. The specification is amended, as shown above, to include reference to FIGS. 59-61 in the "Brief Description of the Drawings" and in the "Detailed Description."

Drawings

The Examiner has objected to the drawings for failure to include references number in FIGS. 59-61. Applicants amend FIGS. 59-61 to include reference numbers for each step shown in these figures.

Claim Rejections under 35 U.S.C. §112

Claim 1 is rejected under 35 U.S.C. §112, second paragraph, for being indefinite regarding the phrase "said signaling." Claim 1 is amended as shown above to correct the antecedent basis.

Claim Rejections under 35 U.S.C. §103

Claims 1, 24, 25, and 28

Claims 1, 24, 25, and 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,731,625 of Eastep, in view of U.S. Patent No. 6,772,139 of Smith, U.S. Patent No. 6,370,141 of Giordana, and U.S. Publication No. 2003/0058277 of Bowman.

As Applicants stated in the Office Action Response dated October 20, 2005, a patentee is entitled to a patent unless the invention is anticipated or obvious in view of the prior art (35 U.S.C. §102). The Examiner is required to cite references supporting a rejection of claims, and must point the Applicants to the relevant portions of those references (37 C.F.R.§1.104(c)(2)).

While the Applicants thank the Examiner for providing more specificity regarding Eastep beyond the sections of the table of contents cited in this and previous Office Actions, a closer inspection of these newly cited portions of Eastep cited in the Examiner's Response to Arguments (on page 4) and in the §103 rejection (on pages 29-30) show that these portions also do not teach the invention as recited in independent claims 1 and 24. Specifically, these portions of Eastep do not teach instantiating a *feature object* embodying the compiled representation, instantiating a *context object* that maintains information regarding a present state of the call feature or service, and that signals the feature object in regard to events occuring with respect to the call feature or service, and the *feature object responding to the signal from the context object* by effecting execution of one or more of the operations in the compiled representation of the textual description in the mark-up language. Nor do Smith, Giordano, or Bowman teach these features of the independent claims.

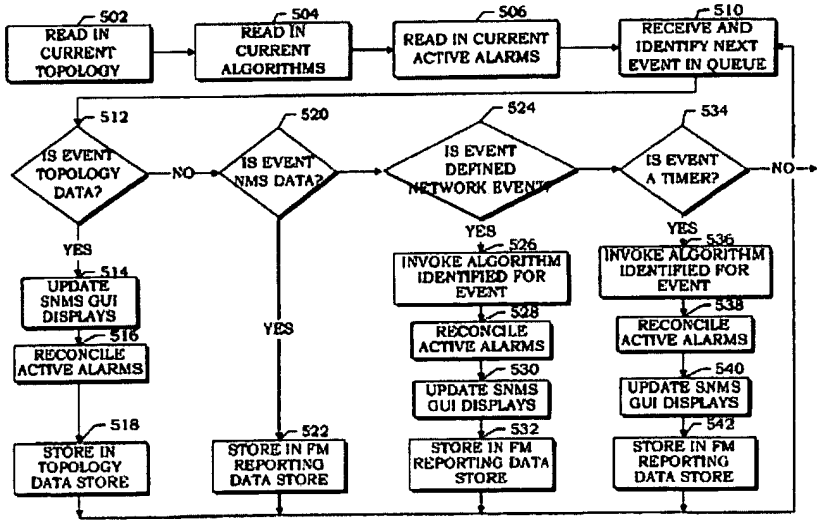

FIG. 5

On page 4 of the Office Action, the Examiner cites a number of figures of Eastep as teaching features of the independent claims, specifically the usage of a compiled representation and textual descriptions. For example, the Examiner cites FIG. 5 of Eastep, reproduced in this response. FIG. 5 depicts the process of the Process Events component shown in FIG. 4, which receives events from other components of the system, parses the events to extract data, and identifies the event type. As shown in FIG. 5, information is read into the Process Events component, which then determines the event types, and takes some action based on that determination. There is no teaching regarding FIG. 5 that relates to instantiating a feature and context object as recited in the independent claims.

The Examiner's citation of FIGS. 3, 6, 7, 55A, 55b, 81, and 100 of Eastep on page 4 of the Office Action are equally deficient. Like FIG. 5, none of these figures teach features of the claims, including instantiating a feature and context object as recited in claims 1 and 24.

Further, claim 1 of the instant application recites "instantiating a context object that maintains information regarding a present state of the call feature or service, and that signals the feature object in regard to events occuring with respect to the call feature or service." In addition to the portions of the table of contents of Eastep, the Examiner contends that this recitation is taught by the following passages from Eastep, cited on page 29 of the Office Action:

Service Feature Principles

1. All service features are described by a combination of one or more capabilities.
2. All service features can be defined by a finite number of capabilities.
3. Individual service features must be defined using a standard methodology to allow service designers to have a common understanding of a capability. Each service feature must document their inputs, outputs, error values, display behaviors, and potential service applications.
4. Interaction of physical entities in the network implementation shall not be visible to the user of the service feature through the service feature interfaces.
5. Each service feature should have a unified and stable external interface. The interface is described as a set of operations, and the data required and provided by each operation.
6. Service features are not deployed into the network by themselves. A service feature is only deployed as part of a service logic program which invokes the service feature (see FIG. 21). Thus, service features linked into service logic programs statically, while capabilities are linked to service logic programs dynamically. This is where the loose coupling of resources to services is achieved.

Capability Principles

1. Capabilities are defined completely independent from consideration of any physical or logical implementation (network implementation independent).
2. Each capability should have a unified and stable interface. The interface is described as a set of operations, and the data required and provided by each operation.
3. Individual capabilities must be defined using a standard methodology to allow service designers to have a common understanding of a capability. Each capability must document their inputs, outputs, error values, display behaviors, and potential service applications.
4. Interaction of physical entities in the network implementation shall not be visible to the user of the capability through the capability interfaces.
5. Capabilities may be combined to form high-level capabilities.
6. An operation on a capability defines one complete activity. An operation on a capability has one logical starting point and one or more logical ending points.
7. Capabilities may be realized in one or more piece of physical hardware or software in the network implementation.

Eastep at Column 31, lines 11-58

Subscriptions—asynchronous stream of ISP master data;
Cache copies—a snapshot copy of ISP master data;
Action—any control activity; and
Controls any control data.
Domain Associations
In general the Satellite domains **2222** of Data Management **2138** encompass:
ISP Applications;
External systems;
Network interfaces **2226** and system gateways **2230**; and
Database client (dbClient) **2234**.
The Central domain for Data Management **2138** encompasses:
Monitoring (dbMon) **2240**;
Administration (dbAdmin) **2238**; and
Database masters (dbServer) **2236**

Eastep at Column 41, lines 31-48

Play Customer Specific Voice Messages;
Prompt for User Input;
User Input based Information Access;
Call Extending Capabilities;
Call Bridging Capabilities;
Audio Conference Capabilities;
Call Transfer Capabilities;
Record User Voice Messages;
Remote Update of Recorded Voice; and
Send/Receive Fax.
Additional Components
In addition to the above mentioned components, a set of additional components are also architected into the MCI Intelligent Network. These components are:
Intelligent Call Routing (ICR) services are offered for specialized call routing based on information obtained from the calling party either during the call or at an earlier time. Routing is also based on the knowledge of the physical and logical network layout. Additional intelligent routing services based on time of day, alternate routing based on busy routes are also offered.

Eastep at Column 21, lines 11-34

These portions of Eastep are neither substantive nor particularly pertinent to the pending claims. For example, neither mentions "a feature object" nor "a context object" as provided in Applicant's recitation.

Still further, claim 1 recites "the feature object responding to said signal from the context object by effecting execution of one or more of the operations in the compiled representation of the textual description in the mark-up language". Applicants again must rely on the portions of Eastep

cited by the Examiner in page 29-30 of the Office Action. The Examiner contends that this recitation is taught by portions of Column 41 shown above, and the following passage from Eastep:

> specialized call routing based on information obtained from the calling party either during the call or at an earlier time. Routing is also based on the knowledge of the physical and logical network layout. Additional intelligent routing services based on time of day, alternate routing based on busy routes are also offered.
>
> Billing is a key component of the MCI Intelligent Network. The billing component provides services for customer billing based on call type and call duration. Specialized billing services are additionally provided for value added services like the 800 Collect calls.
>
> Fraud Monitoring component is a key component of the MCI Intelligent Network providing services for preventing loss of revenue due to fraud and illegal usage of the network.
>
> Operational Measurements include information gathering for analysis of product performance. Analysis of response to advertising campaigns, calling patterns resulting in specialized reports result from operational measurements. Information gathered is also used for

Eastep at Column 21, lines 28-48

These portions of Eastep do not seem to be substantive nor particularly pertinent to the pending claims. For example, neither mentions "a feature object" as provided in Applicant's recitation.

The Examiner cites the same portions of Eastep shown above with respect to independent claim 24. As stated above with regard to claim 1, these passages are deficient and are not particurly pertinent to the pending claims, including claim 24.

Thus, for these reasons, among others, the rejection of claims 1, 24, 25, and 28 is without merit and should be withdrawn.

Claim 2

Claim 2 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Eastep, Smith, Giordano, and Bowman, in view of U.S. Patent No. 5,646,947 of Cooper.

Claim 2 is dependent on claim 1, and hence contains all the features of claim 1. As discussed above, Eastep, Smith, Giordano, and Bowman do not teach the features of claim 1. Cooper fails to remedy the deficiencies of those references, as Cooper fails to teach instantiating a *feature object* embodying the compiled representation, instantiating a *context object* that maintains information regarding a present state of the call feature or service, and that signals the feature object in regard to events occuring with respect to the call feature or service, and the *feature object responding to the signal from the context object* by effecting execution of one or more of the operations in the compiled representation of the textual description in the mark-up language. Hence, claim 2 is patentable over the combined references.

Claim 3

Claim 3 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Eastep, Smith, Giordano, Bowman, and Cooper, in view of U.S. Patent No. 6,597689 of Chiu.

Claim 3 is dependent on claim 1, and hence contains all the features of claim 1. As discussed above, Eastep, Smith, Giordano, and Bowman do not teach the features of claim 1, and Cooper does not remedy their deficiencies. Chiu fails to remedy the deficiencies of those references, as Chiu fails to teach instantiating a *feature object* embodying the compiled representation, instantiating a *context object* that maintains information regarding a present state of the call feature or service, and that signals the feature object in regard to events occuring with respect to the call feature or service, and the *feature object responding to the signal from the context object* by effecting execution of one or more of the operations in the compiled representation of the textual description in the mark-up language. Hence, claim 3 is patentable over the combined references.

Claim 4

Claim 4 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Eastep, Smith, Giordano, and Bowman, in view of U.S. Patent No. 5,991,389 of Ram.

Claim 4 is dependent on claim 1, and hence contains all the features of claim 1. As discussed above, Eastep, Smith, Giordano, and Bowman do not teach the features of claim 1. Ram fails to remedy the deficiencies of those references, as Ram fails to teach instantiating a *feature object* embodying the compiled representation, instantiating a *context object* that maintains information regarding a present state of the call feature or service, and that signals the feature object in regard to events occuring with respect to the call feature or service, and the *feature object responding to the signal from the context object* by effecting execution of one or more of the operations in the compiled representation of the textual description in the mark-up language. Hence, claim 4 is patentable over the combined references.

Claims 5, 6, 7

Claims 5, 6, and 7 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eastep, Smith, Giordano, Bowman, and Ram, in view of Cooper.

Claims 5, 6, and 7 are dependent on claim 1, and hence contains all the features of claim 1. As discussed above, Eastep, Smith, Giordano, and Bowman do not teach the features of claim 1, and Cooper and Ram both fail to remedy the deficiencies of those references. Hence, claims 5, 6, and 7 are patentable over the combined references.

Claims 8 and 9

Claims 8 and 9 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eastep, Smith, Giordano, Bowman, Ram, and Cooper, in view of U.S. Patent No. 6,333,931 of LaPier.

Claims 8 and 9 are dependent on claim 1, and hence contains all the features of claim 1. As discussed above, Eastep, Smith, Giordano, and Bowman do not teach the features of claim 1, and Ram and Cooper fail to remedy their deficiencies. LaPier fails to remedy the deficiencies of those references, as LaPier fails to teach instantiating a *feature object* embodying the compiled representation, instantiating a *context object* that maintains information regarding a present state of the call feature or service, and that signals the feature object in regard to events occuring with

respect to the call feature or service, and the *feature object responding to the signal from the context object* by effecting execution of one or more of the operations in the compiled representation of the textual description in the mark-up language. Hence, claims 8 and 9 are patentable over the combined references.

Claims 10 and 11

Claims 10 and 11 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eastep, Smith, Giordano, and Bowman, in view of U.S. Patent No. 6,144,723 of Truchon.

Claims 10 and 11 are dependent on claim 1, and hence contains all the features of claim 1. As discussed above, Eastep, Smith, Giordano, and Bowman do not teach the features of claim 1. Truchon fails to remedy the deficiencies of those references, as Truchon fails to teach instantiating a *feature object* embodying the compiled representation, instantiating a *context object* that maintains information regarding a present state of the call feature or service, and that signals the feature object in regard to events occuring with respect to the call feature or service, and the *feature object responding to the signal from the context object* by effecting execution of one or more of the operations in the compiled representation of the textual description in the mark-up language. Hence, claims 10 and 11 are patentable over the combined references.

Claims 26 and 27

Claims 26 and 27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Eastep, Smith, Giordano, and Bowman, in view of U.S. Patent No. 5,995,831 of Gulliford.

Claims 26 and 27 are dependent on claim 24, and hence contains all the features of claim 24. As discussed above, Eastep, Smith, Giordano, and Bowman do not teach the features of claim 24. Gulliford fails to remedy the deficiencies of those references, as Gulliford fails to teach instantiating a feature object embodying the compiled representation, and instantiating a context object in response to an event which maintains information regarding a present state of the call service, and the context object signalling the feature object to access the compiled representation and to effect

execution of the call service defined by the logic instructions. Hence, claims 26 and 27 are patentable over the combined references.

Claims 32-38 and 40

Claims 32, 37, 38 and 40 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,490,564 of Dodrill in view of Eastep, Smith, Giordano, and Bowman, and claims 33-36 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Dodrill, Eastep, Smith, Giordano, and Bowman, in view of U.S. Patent No. 6,226,286 of Danne. Claims 32-38 and 40 are canceled without prejudice. Applicants reserve the right to re-introduce these claims at a later time. Thus, the basis for these objections is obviated.

Conclusion

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

By_____

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